

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

MICHELLE KEYLON and ALEXUS
GERDES, individually and on behalf of all
other similarly situated individuals,

Plaintiff,

v.

NELNET, INC.,

Defendant.

4:20-CV-03059

VOLUNTARY DISMISSAL WITHOUT
PREJUDICE

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE, PURSUANT TO
FED. R. CIV. P. 41(a)(1)(A)(i)**

Plaintiffs filed their Complaint on June 1, 2020. *See*, Doc. # 1. To date, no answer or responsive pleading has been filed by Defendant. Fed. R. Civ. P. 41(a)(1)(A)(i) provides that “the plaintiff may dismiss an action without a court order by filing a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment.”

Accordingly, Plaintiffs hereby file this notice of voluntary dismissal of their Complaint, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: June 12, 2020

Respectfully submitted,

/s/ Kelly Brandon,
Kelly Brandon, NE Bar No. 20734
Aimee Bataillon, NE Bar No. 22190
Fiedler Law Firm, PLC
20615 Hwy 370
Gretna, NE 68028
Phone: (402) 316-3060
kelly@employmentlawnebraska.com
aimee@employmentlawnebraska.com

*[Additional signatures of counsel on
following page]*

Jason Thompson (*pro hac vice* forthcoming)
Charles R. Ash (*pro hac vice* forthcoming)
SOMMERS SCHWARTZ, P.C.
One Towne Square, 17th Floor
Southfield, Michigan 48076
Phone: (248) 355-0300
jthompson@sommerspc.com
crash@sommerspc.com

*Attorneys for Plaintiff and the Putative
Class/Collective Action Members*